



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUN 18 2013

REPLY TO THE ATTENTION OF:

Andrew Hall  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft Air Pollution Permit-to-Install and Operate for Cleveland Public Power – Ridge Road (permit number P0107767, facility ID 1318008750), located in Cleveland, Ohio. The proposed facility would process Municipal Solid Waste (MSW) to remove recyclable materials and batteries, etc, in a material recovery facility then gasify the MSW and combust the gas to generate electricity. The draft permit's allowable emissions are the following: 97.6 tons per year (tpy) of Nitrogen Oxides, 0.21 tpy of lead, 0.074 tpy of mercury, 7.08 tpy of total Hazardous Air Pollutants, 81.7 tpy of Particulate Matter (PM), 75.7 tpy of Sulfur Dioxide (SO<sub>2</sub>), 27.6 tpy of Volatile Organic Compounds, and 84.9 tpy of Carbon Monoxide. The source proposes to use the EPA biomass Carbon Dioxide (CO<sub>2</sub>) deferral rule for the biogenic CO<sub>2</sub> emissions, and keep the non-biogenic CO<sub>2</sub> emissions below the 100,000 tpy GreenHouse Gas major source threshold. Cuyahoga County is currently in non-attainment for PM smaller than 2.5 microns (PM<sub>2.5</sub>), and partial non-attainment for lead.

To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. The draft permit requires annual emission testing for all the permit's listed pollutants that don't have a Continuous Emission Monitor, and also requires initial emission testing for all the permit's pollutants. Page 33 of the draft permit lists the testing methods to be used, but there is no test method for CO<sub>2</sub>. Please add the CO<sub>2</sub> emission test method to the permit.
2. The modeling discussion in the record for the draft permit should include additional documentation on the methodology used, including a discussion of the whether background concentrations and nearby sources were included in the national ambient air quality standard analysis, a discussion of the Nitrogen Oxide to Nitrogen Dioxide (NO<sub>2</sub>)

conversion assumptions made in the NO<sub>2</sub> modeling, and information on the emissions used to model for the short-term NO<sub>2</sub>, SO<sub>2</sub>, and PM<sub>2.5</sub> standards.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Richard Angelbeck, of my staff, at (312) 886-9698.

Sincerely,

A handwritten signature in cursive script, reading "Genevieve Damico".

Genevieve Damico  
Chief  
Air Permits Section